

HIGHLY CONFIDENTIAL

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN

U.S. Water Services, Inc., and
Roy Johnson

Plaintiffs,

v.

Novozymes A/S, and
Novozymes North America, Inc.,

Defendants.

Case No. 13-cv-864-bbc

**Supplemental Expert Report of Richard F. Bero, CPA, CVA
June 30, 2015**

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I. Introduction

A. Assignment

I have previously submitted an Expert Report dated April 1, 2015 (the “Bero Report”) in this matter in which I provided expert opinions on damages issues on behalf of the Plaintiffs in relation to *U.S. Water Services, Inc. and Roy Johnson v. Novozymes A/S and Novozymes North America, Inc.*, Case No. 13-cv-864-bbc. The Bero Report dated April 1, 2015 is incorporated herein and my opinions remain unchanged.

U.S. Water Services, Inc. and Roy Johnson (collectively, “U.S. Water”) have alleged that Novozymes A/S and Novozymes North America, Inc. (collectively, “Novozymes”) infringe United States Patent No. 8,415,137 (the “’137 patent”), issued on April 9, 2013, titled “Preventing Phytate Salt Deposition in Polar Solvent Systems” and/or United States Patent No. 8,609,399 (the “’399 patent”), issued on December 17, 2013, titled “Reducing Insoluble Deposit Formation in Ethanol Production” (collectively, “the U.S. Water patents” or “the Patents-in-Suit”).¹

B. Basis for opinions

The basis for my opinions on damages issues related to the ‘137 patent and the ‘399 patent are set forth in the Bero Report. In addition, I have now analyzed and considered additional information made available subsequent to the issuance of the Bero Report, including:

- [REDACTED]
- Rebuttal Expert Report and Disclosure of Julie L. Davis dated May 1, 2015 (the “Davis Report”);
- Supplemental Rebuttal Expert Report and Disclosure of Julie L. Davis dated June 11, 2015 (the “Supplemental Davis Report”);
- Rough draft deposition of Julie Davis date June 16, 2015;
- Three [REDACTED] Novozymes agreements with [REDACTED]

¹ First Am. Compl.

- [REDACTED]
[REDACTED]
[REDACTED]
- [REDACTED]
[REDACTED]
- [REDACTED]
[REDACTED]
- Post-Trial Findings of Fact and Conclusions of Law dated February 16, 2007, in *Novozymes A/S v. Genencor International, Inc. and Enzyme Development Corporation* 05-160-KAJ (D. Del.) (the “Novozymes and Genencor 2007 Judgment”);
- Additional documents provided since April 1, 2015; and
- Additional depositions taken and declarations provided since April 1, 2015.

As a result of this new information, I have been asked to supplement the Bero Report. I have enclosed a complete set of updated schedules to incorporate the information above, and, in some cases, clarify information on previously issued schedules.²

A detailed list of data and other information I have considered at this time in developing my opinions is included as **Supplemental Attachment 1**. In the event that additional relevant information becomes available after the issuance of this Supplemental Report, I will incorporate such information as necessary. I also may incorporate additional information in response to any expert report or opinions proffered on behalf of Novozymes.

C. Trial

In preparing for trial, I may prepare demonstrative exhibits based upon information included in the Bero Report, this report or additional information that becomes available hereafter.

² **Schedule 11.0** and **Schedules 12.0 - 12.6** are new and reflect the [REDACTED] sales information. I have made other minor changes / and clarified the wording on various other schedules and have added **Schedule 6.7**. None of these changes affect my opinions.

D. Expert experience and compensation

My experience and qualifications are set forth in the Bero Report. My curriculum vitae, including a list of my testimonial experience in the last four years and publications in the last ten years, is included as **Supplemental Attachment 2**.

Compensation to The BERO Group for professional services provided in preparing this report is based on our customary hourly fees as set forth in the Bero Report.

E. Basic damages assumptions

My basic damages assumptions are included in the Bero Report.³

II. Novozymes' Phytaflow – updated costs and profits

The Supplemental Davis Report describes a conversation Ms. Davis had with [REDACTED] regarding cost data related to sales of Phytaflow as follows:⁴

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

At the time of the Bero Report, such descriptions of [REDACTED] were not available and I assumed [REDACTED].⁵ As a result, the total Phytaflow costs and costs per pound included in the Bero Report were overstated, and the associated Phytaflow profits were understated.

I have accounted for this new information and have updated **Schedules 5.0-5.3**. As shown on updated **Schedule 5.0**, Novozymes' Phytaflow profit increased to [REDACTED] at the time of the hypothetical negotiation, as stated in the Bero Report.⁶

³ Bero Report 3-4.

⁴ Supplemental Davis Report 1.

⁵ **Schedules 5.0-5.3**.

⁶ Bero Report **Schedule 5.0**.

III. [REDACTED] sales and profitability data confirms the upward effect on the starting point royalty rate range of \$5.00 to \$10.00 per pound

In the Bero Report, I noted that Novozymes' [REDACTED] product [REDACTED]

[REDACTED].⁷ [REDACTED]
[REDACTED]
[REDACTED].⁸

In addressing *Georgia-Pacific* Factor #6, which considers “the effect of selling the patented specialty in promoting sales of other products of the licensee,” I noted that Novozymes had adopted the use of Phytaflow [REDACTED], and that [REDACTED] sales would have presented Novozymes with an opportunity to factor those REDAC sales and profits into Phytaflow pricing.⁹ I treated *Georgia-Pacific* Factor #6 as suggesting an upward effect on the starting point royalty rate range of \$5.00 to \$10.00 per Phytaflow pound.¹⁰

At the time of the Bero Report, Novozymes had not produced its [REDACTED] sales, costs, profits or customers.¹¹ Since the issuance of the Bero Report, Novozymes has provided this information, which I have summarized on **Schedules 11.0** and **12.0-12.6**. The [REDACTED] sales and profits data further confirm the upward effect of *Georgia-Pacific* Factor #6 relative to the starting point royalty rate range.

For example, analysis of the [REDACTED] data in conjunction with the Phytaflow and pHytOUT data highlights that most [REDACTED]

[REDACTED]
[REDACTED].¹²
• [REDACTED]
[REDACTED]
• [REDACTED]
[REDACTED]
[REDACTED]

⁷ Bero Report 17-19; 31-32.

⁸ Bero Report 17-19; 31-32.

⁹ Bero Report 32.

¹⁰ Bero Report 31-32.

¹¹ Bero Report 32.

¹² **Schedule 12.0**. Note all [REDACTED] sales, costs and profits data is presented on **Schedules 11.0** and **12.0-12.6**.

- [REDACTED]
[REDACTED].¹³
- [REDACTED]
[REDACTED]
[REDACTED]
- [REDACTED]
[REDACTED]
- [REDACTED]
[REDACTED]
[REDACTED]

I also addressed [REDACTED] in *Georgia-Pacific* Factor #11 in the Bero Report which considers “*The extent to which the infringer has made use of the invention and any evidence probative of the value of that use.*”¹⁴ While I noted that to the extent Novozymes had used sales and/or profitability of Phyttaflow to derive value from [REDACTED], this factor would suggest an upward effect on the low end of the starting point royalty rate range.¹⁵ Overall, I treated this factor as neutral.¹⁶ Given the [REDACTED] sales and profit data as addressed above, [REDACTED]

[REDACTED]
[REDACTED] *Georgia-Pacific* Factor #11 suggests an upward effect on the starting point royalty rate range.

IV. Three [REDACTED] Novozymes agreements with [REDACTED]

As explained in the Bero Report, one of the quantitative considerations of a reasonable royalty analysis could be the market approach,¹⁷ and the market approach considers comparable licenses and royalty rates. In my analysis of *Georgia-Pacific* Factor #2, I stated:¹⁸

I am not aware of any comparable license agreements where Novozymes is the licensee. This factor has **no effect** on the starting point royalty rate range.

¹³ Schedule 12.0.

¹⁴ Bero Report 35.

¹⁵ Bero Report 35.

¹⁶ Bero Report 35.

¹⁷ Bero Report 21-22.

¹⁸ Bero Report 30.

Since the issuance of the Bero Report, Novozymes has produced three [REDACTED] Novozyme agreements with [REDACTED]. The Davis Report addresses two of the three [REDACTED] agreements in its section titled “customary rates in the industry.”¹⁹ [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

A. [REDACTED] Agreement

[REDACTED]
[REDACTED]

[REDACTED].²¹ The Davis Report addresses this agreement under a section titled “customary rates in the industry.”²² Of the two agreements it addresses, the Davis Report suggests that [REDACTED]

[REDACTED].²³ [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

¹⁹ Davis Report 23-26.

²⁰ [REDACTED].

²¹ [REDACTED].

²² Davis Report 23.

²³ Davis Report 44.

²⁴ [REDACTED].

²⁵ [REDACTED].

²⁶ [REDACTED]

[REDACTED]

²⁷ [REDACTED].

[REDACTED]

[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

B. [REDACTED] Agreement

[REDACTED]

[REDACTED]

[REDACTED]³¹ This is the second agreement that the Davis Report addresses under the section titled “customary rates in the industry.” [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED]³⁴

28 [REDACTED]
29 [REDACTED]
30 [REDACTED]
31 [REDACTED]
32 [REDACTED]
33 [REDACTED]
34 [REDACTED]

[REDACTED]

C. [REDACTED] Agreement

[REDACTED]

[REDACTED]

[REDACTED].³⁶ The Davis Report does not address this Agreement. [REDACTED]

[REDACTED]

[REDACTED].³⁷

[REDACTED]

D. [REDACTED] Novozyme agreements have no effect on my analysis

At this point, I understand that the information provided relative to the three [REDACTED] Novozymes agreements has been limited to the agreements themselves and the deposition testimony of Ms. Davis, Novozymes damages expert. I understand that U.S. Water has asked for further testimony from Novozymes personnel, however, that has not yet been provided.³⁸

The three [REDACTED] agreements are not relevant to the April 2013 hypothetical negotiation between U.S. Water and Novozymes for the '137 patent and/or '399 patent. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

- [REDACTED]

³⁵ [REDACTED]

³⁶ [REDACTED]

³⁷ [REDACTED]

³⁸ Discussions with counsel.

- [REDACTED]
[REDACTED]
[REDACTED] [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
- [REDACTED]
[REDACTED]
[REDACTED]
- [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
- [REDACTED]
[REDACTED]
[REDACTED] [REDACTED]
[REDACTED]
- [REDACTED]
[REDACTED]
- [REDACTED]
[REDACTED]
[REDACTED] [REDACTED]
[REDACTED]
[REDACTED]
- [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

39

- [REDACTED]
[REDACTED]
- [REDACTED]
[REDACTED]
- [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

V. Novozymes and Genencor 2007 Judgment – no effect on my analysis

Judge Kent Jordan’s ruling dated February 16, 2007 in the *Novozyymes A/S v. Genencor International, Inc. and Enzyme Development Corporation* litigation (“2007 Judgment”) is referred to by the Davis Report as a relevant factor considered in the hypothetical negotiation. The Davis Report used this 2007 Judgment to provide its high end of the starting point range of royalty rates (20%).⁴⁹ The Judgment is also addressed in the Davis Report’s discussion of “customary rates in the industry” section.⁵⁰ According to the 2007 Judgment, Novozymes sued Genencor International, Inc. alleging infringement of its ‘031 patent.⁵¹ The ‘031 patent related to variant alpha-amylase enzymes used in the production of fuel ethanol.⁵² Judge Jordan concluded that a reasonable royalty was 20% of sales for products in the U.S. fuel ethanol market and 8% for other markets.⁵³

⁴⁵ [REDACTED]

⁴⁹ Davis Report 25, 44.

⁵⁰ Davis Report 25.

⁵¹ Post-Trial Findings of Fact and Conclusions of Law 1, 6.

⁵² Post-Trial Findings of Fact and Conclusions of Law 1. *See also*, DAVIS00000156 and Davis Report 25.

⁵³ Post-Trial Findings of Fact and Conclusions of Law 21.

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In 1999, Novozymes began the manufacture and sale of its Liquozyme Products which eventually accounted for more than 80% of the dry mill fuel ethanol market.⁵⁴ However, I understand that none of Novozymes' Liquozyme alpha amylase products practiced the '031 patent.⁵⁵ In early 2002, Genencor acquired Enzyme BioSystems Limited ("EBS").⁵⁶ EBS developed and, beginning in 2004, started selling a competing and infringing alpha amylase under the brand name Spezyme Ethyl which had similar benefits as Liquozyme.⁵⁷

On August 24, 2006, Judge Jordan issued a Findings of Fact and Conclusions of Law in which he concluded that Genencor infringed certain claims of the '031 patent.⁵⁸ Of the 29 Spezyme Ethyl customers that Genencor had in 2006, 22 of them either switched or agreed to switch to other Genencor products.⁵⁹

This suggests that the infringer, Genencor, had a replacement product available and acceptable to most of its customers. There apparently also were other replacement products acceptable and available on the market since Novozymes' own alpha amylase products did not use the '031 patent.⁶⁰ No such acceptable replacement product for Phytaflow was available to Novozymes in the hypothetical negotiation at hand.

Novozymes' damages expert, Ms. Julie Davis, testified to a 25% royalty of Spezyme Ethyl sales to the fuel ethanol market and an 8% royalty on other Spezyme sales, those outside of the fuel ethanol market.⁶¹ Ms. Davis approached the hypothetical negotiation through two different analyses. First, she applied a method that she called the "rule of thumb."⁶² Second, Ms. Davis applied a method that she called the 'analytical method.'⁶³ According to the analytical method, the parties would compare the expected profit margin of the infringing product to the typical profit margin for the relevant business.⁶⁴ At a minimum, the 2007 Judgment differs from the hypothetical negotiation as it involves different technology and the licensee had a

⁵⁴ Post-Trial Findings of Fact and Conclusions of Law 7-8.

⁵⁵ Post-Trial Findings of Fact and Conclusions of Law 7. *See also*, DAVIS00000156.

⁵⁶ Post-Trial Findings of Fact and Conclusions of Law 8.

⁵⁷ Post-Trial Findings of Fact and Conclusions of Law 9.

⁵⁸ Post-Trial Findings of Fact and Conclusions of Law 13.

⁵⁹ Post-Trial Findings of Fact and Conclusions of Law 13. Of the seven remaining customers, three switched to Liquozyme and four were testing products from sources other than Genencor.

⁶⁰ Post-Trial Findings of Fact and Conclusions of Law 7. *See also*, DAVIS00000156.

⁶¹ Post-Trial Findings of Fact and Conclusions of Law 12, 24.

⁶² Post-Trial Findings of Fact and Conclusions of Law 23.

⁶³ Post-Trial Findings of Fact and Conclusions of Law 23.

⁶⁴ Post-Trial Findings of Fact and Conclusions of Law 24.

demonstrated replacement product available and acceptable to most of its customers. The 2007 Judgment is not relevant to the hypothetical negotiation at hand and does not affect my analysis. In the event the 2007 Judgment was considered relevant to the matter at hand, Novozymes damages expert, Ms. Davis, used the analytical method, which was also used in the Bero Report as a quantitative consideration under the income approach and which suggests a value of more than \$8.00 per pound in the hypothetical negotiation.⁶⁵

VI. Royalty base

I understand that there are legal disputes over whether allegedly infringing sales should or should not be included in the royalty base due to issues related to direct versus indirect infringement as well as [REDACTED]⁶⁶ I understand that these disputes effect whether Phytaflow sales to customers or plants should or should not be included in the royalty base. Depending on the outcome of their legal disputes, I may be asked to include or exclude allegedly infringing sales as appropriate.

VII. pHytOUT [REDACTED] costs

I have updated my summary of the pHytOUT costs and profits [REDACTED]
[REDACTED]. The effect on costs and profitability is minimal. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED].⁶⁷

VIII. My opinion continues to be that a reasonable royalty is \$8.00 per pound

In the Bero Report, I described the \$5.00 to \$10.00 per Phytaflow pound starting point royalty rate range in detail.⁶⁸ The supplemental data and analysis contained herein further confirm the \$5.00 to \$10.00 per pound starting point royalty rate range.⁶⁹

⁶⁵ Bero Report 26-27.

⁶⁶ Davis Report 52; discussion with counsel.

⁶⁷ **Schedule 6.0**; Bero Report **Schedule 6.0**.

⁶⁸ Bero Report 21-29; Bero Report **Schedule 2.0**.

⁶⁹ **Schedule 2.0**.

With that starting point royalty rate range, I addressed the various additional relevant hypothetical negotiation considerations in the Bero Report throughout the discussion of the *Georgia-Pacific* Factors.⁷⁰ Under *Georgia-Pacific* Factors #14 and #15, as well as my Opinion section, I highlighted and summarized key considerations the parties would have reasonably been aware of at the time of the April 2013 hypothetical negotiation, and I concluded that a reasonable royalty rate is \$8.00 per pound.⁷¹ The supplemental data and analysis contained herein further confirm a reasonable royalty rate of \$8.00 per pound.

IX. Conclusion

My opinions and analyses contained herein are based upon information that is presently known to me. If additional information is made available, I may update my opinions and analyses accordingly. At this point, I have quantified damages through December 31, 2014. I may be asked to provide updated calculations or interest calculations as appropriate, and I will update damages upon receipt of additional allegedly infringing sales or additional relevant information accordingly. Also, to the extent that I am asked to provide a post-judgment royalty analysis, I will do so accordingly. I also note that these damages included in my analysis do not contain any potential residual ongoing future damages resulting Novozymes' alleged infringement with its significantly lower prices.

Respectfully submitted,



Richard F. Bero, CPA, CVA
June 30, 2015

⁷⁰ Bero Report 29-37.

⁷¹ Bero Report 36-39.

Data and Other Information Considered - as of June 30, 2015

Supplemental Attachment 1

DATA AND OTHER INFORMATION CONSIDERED - AS OF THE APRIL 1, 2015 BERO RERPORT:

LEGAL FILINGS:

First Amended Complaint dated February 20, 2014

Memorandum in Support of Novozymes' Motion to Dismiss for Failure to State a Claim Upon Which Relief Can Be Granted and to Stay Discovery dated February 26, 2014

Preliminary Pretrial Conference Order dated March 4, 2014

Plaintiffs' Opposition to Defendants' Motion to Dismiss for Failure to State a Claim Upon Which Relief Can Be Granted and Opposition to Defendants' Motion to Stay Discovery dated March 19, 2014

Reply Memorandum in Support of Novozymes' Motion to Dismiss for Failure to State a Claim Upon Which Relief Can Be Granted and to Stay Discovery dated March 31, 2014

Opinion and Order dated June 11, 2014

Plaintiffs' Answer to Defendants' Counterclaims to Plaintiffs' First Amended Complaint dated July 16, 2014

Stipulated Protective Order dated July 24, 2014

Exhibit A signed by Richard Bero dated November 19, 2014

Defendants Novozymes A/S and Novozymes North America, Inc.'s Amended Answer and Counterclaims to U.S. Water Services, Inc. and Roy Johnson's First Amended Complaint dated November 10, 2014

Defendants Novozymes A/S and Novozymes North America, Inc.'s Amended Answer and Counterclaims to U.S. Water Services, Inc. and Roy Johnson's First Amended Complaint dated November 14, 2014

Plaintiffs' Answer to Defendants' Amended Answer and Counterclaims to Plaintiffs' First Amended Complaint dated December 1, 2014

INTERROGATORIES:

Objections and Responses to Novozymes' Third Set of Interrogatories (No. 17)) to U.S Water Services, Inc. dated November 3, 2014

Second Supplemental and Amended Objections and Responses to Novozymes' Second Set of Interrogatories (nos. 15-16) to U.S Water Services, Inc. dated November 14, 2014

Fourth Supplemental Objections and Responses to Novozymes' First Set of Interrogatories (Nos. 1-14) to U.S Water Services, Inc. dated November 18, 2014

Novozymes' Third Supplemental Responses to Plaintiffs First Set of Interrogatories dated November 14, 2014

Novozymes' First Supplemental Responses to Plaintiffs Second Set of Interrogatories (Nos. 12-15) dated November 14, 2014

Novozymes' First Supplemental Responses to Plaintiffs Third Set of Interrogatories (Nos. 16-18) dated November 14, 2014

Novozymes' First Supplemental Responses to Plaintiffs Fourth Set of Interrogatories (Nos. 19-21) dated November 14, 2014

U.S. PATENTS AT ISSUE:

United States Patent - Patent No. US 8,415,137 B2 - Preventing Phytate Salt Deposition in Polar Solvent System issued on April 9, 2013

United States Patent - Patent No. US 8,609,399 - Reducing Insoluble Deposit Formation in Ethanol Production issued on December 17, 2013

EXPERT REPORTS:

Expert Report of Scott D. Kohl Regarding Invalidity of the Patents-In-Suit dated November 18, 2014

Expert Report of Eric Dorn Regarding Infringement dated November 18, 2014

Corrected Expert Report of Rodney Simms Regarding Validity dated December 18, 2014

Data and Other Information Considered - as of June 30, 2015

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DEPOSITIONS:

[REDACTED]

DISCUSSIONS:

[REDACTED]

U.S. WATER SERVICES DOCUMENTS WITH BATES STAMPS:

USW-N00000176
USW-N00049963 - 00049974
USW-N00005552 - 00005566
USW-N00005568 - 00005579
USW-N00005581 - 00005593

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USW-N00005595 - 00005607
USW-N00005609 - 00005620
USW-N00005622 - 00005634
USW-N00005636 - 00005648
USW-N00049975 - 00049986
USW-N00055347 - 00055395
USW-N00055409 - 00055421
USW-N00056530-001
USW-N00110519
USW-N00110842
USW-N00110873
USW-N00110930 - 00110940

NOVOZYMES DOCUMENTS WITH BATES STAMPS:

NZ-USW00000059
NZ-USW00000106 - 00000126
NZ-USW00000184
NZ-USW00000210
NZ-USW00000219
NZ-USW00001034 - 00001036
NZ-USW00001095 - 00001098
NZ-USW00003348
NZ-USW00003405 - 00003482
NZ-USW00005826
NZ-USW00005853
NZ-USW00005970
NZ-USW00005973
NZ-USW00006025
NZ-USW00006031
NZ-USW00006163
NZ-USW00006169
NZ-USW00006176
NZ-USW00006183
NZ-USW00006248
NZ-USW00006250
NZ-USW00006263
NZ-USW00006276
NZ-USW00006304 - 00006314

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NZ-USW00006337
NZ-USW00006375
NZ-USW00008317
NZ-USW00008498 - 00008500
NZ-USW00008738 - 00008740
NZ-USW00008975
NZ-USW00008985
NZ-USW00009133 - 00009134
NZ-USW00009390 - 00009391
NZ-USW00009400 - 00009404
NZ-USW00009441
NZ-USW00009488 - 00009492
NZ-USW00009639
NZ-USW00009729
NZ-USW00009731
NZ-USW00009735
NZ-USW00009787
NZ-USW00011554 - 00011557
NZ-USW00011567 - 00011569
NZ-USW00011576 - 00011578
NZ-USW00011754 - 00011761
NZ-USW00011822
NZ-USW00011874
NZ-USW00011877
NZ-USW00012038 – 00012044
NZ-USW00012038 - 00012059
NZ-USW00012045 - 00012059
NZ-USW00012118 - 00012132
NZ-USW00012134 - 00012141
NZ-USW00012143 - 00012152
NZ-USW00012154 - 00012161
NZ-USW00012163 - 00012175
NZ-USW00012530 - 00012576
NZ-USW00012642
NZ-USW00012689
NZ-USW00012692
NZ-USW00012788 - 00012789
NZ-USW00013028 - 00013030

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NZ-USW00013624
NZ-USW00013803 - 00013804
NZ-USW00013818
NZ-USW00013821 - 00013823
NZ-USW00013838
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NZ-USW00013955
NZ-USW00013965 - 00013969
NZ-USW00013984
NZ-USW00014040 - 00014041
NZ-USW00014047 - 00014049
NZ-USW00014071 - 00014072
NZ-USW00014074 - 00014075
NZ-USW00014119
NZ-USW00014151 - 00014153
NZ-USW00014162 - 00014164
NZ-USW00014196 - 00014198
NZ-USW00014206
NZ-USW00014213
NZ-USW00014215
NZ-USW00014217 - 00014219
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NZ-USW00014246 - 00014268
NZ-USW00014335 - 00014566
NZ-USW00015620 - 00015645
NZ-USW00015760 - 00015771
NZ-USW00017344 - 00017355
NZ-USW00017448 - 00017449
NZ-USW00017478 - 00017485
NZ-USW00017828 - 00017829
NZ-USW00017832 - 00017862
NZ-USW00017877 - 00017880
NZ-USW00017940 - 00017955

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NZ-USW00017972 - 00017973
NZ-USW00018098 - 00018099
NZ-USW00018132 - 00018134
NZ-USW00018251 - 00018254
NZ-USW00018429 - 00018430
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Data and Other Information Considered - as of June 30, 2015

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Data and Other Information Considered - as of June 30, 2015

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OTHER BATES DOCUMENTS:

DOCUMENTS WITHOUT BATES STAMPS:

Government	Percentage
Current government	85%
Previous government	15%

Data and Other Information Considered - as of June 30, 2015

Supplemental Attachment 1

INDEPENDENT RESEARCH:

WEBSITES:

<http://www.novozymes.com/en/solutions/bioenergy/starch-based-ethanol/viscosity-reduction/Phytaflow/Pages/default.aspx>
<https://web.archive.org/web/20130829121000/http://novozymes.com/en/solutions/bioenergy/starch-based-ethanol/viscosity-reduction/Phytaflow/Pages/default.aspx>
<https://web.archive.org/web/20140612181634/http://novozymes.com/en/solutions/bioenergy/starch-based-ethanol/viscosity-reduction/Phytaflow/Documents/2013-06976-01-Phytaflow.pdf>
<http://report2012.novozymes.com/service/download-report/the-novozymes-report-2012.pdf>

EXISTING CASE LAW:

Aro Mfg. Co. v. Convertible Top Replacement Co. , 377 U.S. 476, 507 (1964)
Georgia-Pacific Corp. v. U.S. Plywood Corp. , 318 F. Supp. 1116, 1120 (S.D.N.Y. 1970)
Fromson v. Western Litho Plate & Supp. Co., 853 F.2d 1568, 1575 (Fed. Cir. 1988)
Rite-Hite Corp. v. Kelley Co., 56 F.3d 1538, 1545 (Fed. Cir. 1995)
Lucent Techs., Inc. v. Gateway, Inc. , 580 F.3d 1301, 1324-1325, 1333-1334 (Fed. Cir. 2009)
LaserDynamics, Inc. v. Quanta Computer, Inc., 694 F.3d 51 (Fed. Cir. 2012)
Ericsson, Inc., v. D-Link Systems, Inc. (Fed. Cir. 2014)

OTHER:

35 U.S.C. § 284 (1994)
Compensatory Damage Issues in Patent Infringement Cases: A Handbook for Federal District Court Judges 3, Jan. 2010

DATA AND OTHER INFORMATION CONSIDERED - RECEIVED AFTER BERO REPORT DATED APRIL 1, 2015:

ADDITIONAL LEGAL FILINGS - OTHER MATTER:

Post-Trial Findings of Fact and Conclusions of Law dated February 16, 2007, *Novozymes A/S v. Genencor International, Inc. and Enzyme Development Corporation* 05-160-KAJ (D. Del.)

ADDITIONAL EXPERT REPORTS OF:

Expert Report of Scott D. Kohl, Ph.D. Regarding Damages dated May 1, 2015
Rebuttal Expert Report of Julie L. Davis dated May 1, 2015
Supplemental Rebuttal Expert Report and Disclosure of Julie L. Davis dated June 11, 2015

ADDITIONAL DEPOSITIONS:

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Data and Other Information Considered - as of June 30, 2015

Supplemental Attachment 1

[REDACTED]
[REDACTED]
[REDACTED]

ADDITIONAL U.S. WATER SERVICES DOCUMENTS WITH BATES STAMPS:

USW-N00002768-00002772
USW-N00013874-00013879
USW-N00022360-00022361
USW-N00040408-00040413
USW-N00056497
USW-N00109279-00109298
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USW-N00111934-00111948
USW-N00113677
USW-N00113691-00113699

ADDITIONAL NOVOZYMES DOCUMENTS WITH BATES STAMPS:

NZ-USW00011684-00011692
NZ-USW00027009-00027014
NZ-USW00029067-00029125
NZ-USW00029133-00029155
NZ-USW00029181-00029390
NZ-USW00030655

DAVIS DOCUMENTS WITH BATES STAMPS:

DAVIS00000145-476

ADDITIONAL DOCUMENTS WITHOUT BATES STAMPS:

Equipment Services Website Page: uswaterservices.com/our-services/equipment-services
Engineering Services Website Page: uswaterservices.com/our-services/engineering-services
DuPont Industrial Biosciences Company History Website Page: biosciences.dupont.com/about-us/history/

Data and Other Information Considered - as of June 30, 2015

Supplemental Attachment 1

The Novozymes History Website Page: novozymes.com/en/about-us/facts-about-Novozymes-history/Pages/default.aspx

About DuPont Industrial Biosciences Website Page: biosciences.dupont.com/about-us/

Ethanol Producer Magazine Website Page: ethanolproducer.com/plants/listplants/US/Existing/Sugar-Starch/

ADDITIONAL INDEPENDENT RESEARCH:

WEBSITES:

<http://www.ethanolrfa.org/pages/statistics>

Any additional documents, websites or other information referenced throughout this report.



RICHARD F. BERO, CPA, CVA

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rbero@berogroup.com

PROFESSIONAL EXPERIENCE:

The BERO Group / Corporate Financial Advisors, LLC

Managing Director

Waukesha, Wisconsin

December 1995-Present

Mr. Bero founded Corporate Financial Advisors in 1995 and served as Managing Director. The BERO Group evolved from Corporate Financial Advisors and Mr. Bero serves as Managing Director. Mr. Bero provides financial and accounting consulting services and expert testimony pertaining to valuation issues and financial damages issues.

Coopers & Lybrand

Manager – Litigation & Claims Services

Milwaukee, Wisconsin

1994-1995

Mr. Bero was the Manager and Practice Leader of the Coopers & Lybrand Milwaukee Litigation & Claims Services practice.

Peterson Consulting Limited Partnership

Executive Consultant

Milwaukee, Wisconsin

Chicago, Illinois

1989-1994

1987-1989

Mr. Bero provided litigation and business dispute support services to trial attorneys and corporate counsel.

EDUCATION:

University of Wisconsin–Madison

Bachelor of Business Administration

Accounting and Finance

1986

ACTIVITIES/OTHER:

Intellectual Property Valuation Instructor – National Association of Certified Valuation Analysts

Licensing Executives Society – Co-Chair Wisconsin Chapter – 2006-2008

Intellectual Property Owners Association – Damages Committee Member – 2004-present

National Association of Certified Valuation Analysts, CVA

Wisconsin Institute of Certified Public Accountants:

Board of Directors – 2000-2002

Chairman CPA's In Industry – Committee 1997-1999

Outstanding Committee Chairperson Award – 1997-1998

American Institute of Certified Public Accountants

Becker CPA Review – Instructor 1995-1998

Illinois Certified Public Accountant Society

PRESENTATIONS:

April 2014	Michigan Intellectual Property Law Association Hot Topics in Patent Damages Troy, Michigan
May 2013	Hot Topics in Patent Royalty Damages Business Valuation Resources Online Symposium on Economic Damages: Part 3 Chicago, Illinois
September 2011	WestLegalEdcenter Webinar Recent Patent Damages Decisions – What is the Effect
August 2011	WestLegalEdcenter Webinar Constructing Royalty Rate Damages
January 2011	The Evolution of the Entire Market Value Rule Business Valuation Resources Webinar Series on Advanced Topics in Lost Profits Damages Chicago, Illinois
September 2010	Patent Damages: Managing the Risks and Contingent Costs Business Valuation Resources / Morningstar Summit on Best Practices in Valuing Intellectual Property Chicago, Illinois
March 2010	Tianjin Bar Association Damage Analysis Techniques and Considerations in U.S. Patent Litigations Tianjin, China

March 2010	Beijing Lawyers Association Damage Analysis Techniques and Considerations in U.S. Patent Litigations Beijing, China
December 2009	Milwaukee Bar Association Constructing Royalty Rate Damages Milwaukee, Wisconsin
October 2009	Michigan Intellectual Property Law Association Constructing Royalty Rate Damages Detroit, Michigan
June 2009	Licensing Executive Society – Chicago Chapter Constructing Royalty Rates Chicago, Illinois
March 2009	Milwaukee Bar Association Patent Infringement Damages – Working Effectively With Your Damages Expert Milwaukee, Wisconsin
January 2009	Wisconsin Intellectual Property Law Association Constructing Royalty Rates Milwaukee, Wisconsin
November 2008	Licensing Executive Society – Minnesota Chapter Constructing Royalty Rates Minneapolis, Minnesota
October 2008	American Intellectual Property Law Association – Annual Meeting Constructing Royalty Rates Washington, D.C.
October 2008	Minnesota Intellectual Property Law Association Constructing Royalty Rates Minneapolis, Minnesota
June 2008	Presentation to Judges and IP attorneys in China The Development of Patent Damages Shenzhen, China
May 2008	Licensing Executive Society International – Spring Conference Avoiding Intellectual Property Hurdles in the U.S. - The View from China Roundtable Moderator Chicago, Illinois
March 2008	Marquette Law School Royalty Damages in Patent Litigation Guest Instructor – IP Litigation Class Milwaukee, Wisconsin

October 2007	Guarding the Treasure: IP Valuation & Remedies Panelist Sponsored by Foley & Lardner New York, New York
October 2007	Shanghai Bar Association Patent Litigation & Valuation – Real World Examples in the U.S. Shanghai, China
October 2007	Shenzhen Society of Certified Public Appraisers Intellectual Property, Valuation and Damages Analysis – Real World Examples in the U.S. Shenzhen, China
May 2007	Shanghai Intellectual Property Service Center Intellectual Property in the U.S.: Opportunities, Valuation & Litigation Shanghai, China
May 2007	Shenzhen Bar Association Managing and Understanding the Value of IP – Real World Examples in the U.S. Shenzhen, China
October 2006	China Hi-Tech Fair 2006 Protection of Chinese Intellectual Property in the U.S. Patent Damages & Ways to Avoid Infringement Shenzhen, China
August 2006	Nanshan Sub-Bureau of Intellectual Property Administration Intellectual Property Value Issues in the United States an Overview for Chinese Businesses Shenzhen, China
March 2006	Milwaukee Bar Association Hindsight is 20/20: Developing & Presenting Damages in Intellectual Property Litigation and Complex Litigation Milwaukee, Wisconsin
December 2005	Wisconsin Intellectual Property Law Association Intellectual Property Damages Update & Discussion Pewaukee, Wisconsin
October 2005	Licensing Executives Society – Annual Meeting Facilitator: Advanced Practices Working Session III: To Sue or Not? How to Decide Phoenix, Arizona
September 2005	Digital Fabrication 2005 Seminar Panel Discussion: Intellectual Property Baltimore, Maryland

September 2005	Intellectual Property Owner's Annual Meeting Patent Infringement Damages Update and Discussion Seattle, Washington
April 2005	Licensing Executives Society – Wisconsin Chapter What's Reasonable: Royalty Damages in Patent Litigation Fond Du Lac, Wisconsin

EXPERT WITNESS TESTIMONY – LAST FOUR YEARS:

U.S. Water Services, Inc. and Roy Johnson v. Novozymes A/S and Novozymes North America, Inc.

United States District Court – Western District of Wisconsin
June 2015 (Deposition Testimony)

M2M Solutions, LLC v. Enfora, Inc., et al.

United States District Court – District of Delaware
May 2015 (Deposition Testimony)

M2M Solutions, LLC v. Motorola Solutions, Inc., et al.

United States District Court – District of Delaware
May 2015 (Deposition Testimony)

Ameritox, Ltd. and Marshfield Clinic v. Millennium Health, LLC

United States District Court – Western District of Wisconsin
April 2015 (Trial Testimony)
February 2015 (Deposition Testimony)

Henryk Oleksy v. General Electric Company

United States District Court – Northern District of Illinois
October 2014 (Deposition Testimony)

Minitab, Inc. v. EngineRoom, LLC

United States District Court – Middle District of Pennsylvania
October 2014 (Deposition Testimony)

Cognex Corp., and Cognex Technology & Investment, LLC v. Microscan Systems, Inc., and The Code Corporation

United States District Court - Southern District of New York
April 2014 (Trial Testimony)
September 2013 (Deposition Testimony)

Douglas Dynamics v. Buyers Products Company

United States District Court - Western District of Wisconsin
April 2014 (Trial Testimony)
October 2010 (Trial Testimony)
September 2010 (Deposition Testimony)

Cheese Systems, Inc. v. Tetra Pak Cheese and Powder Systems, Inc., et al.

United States District Court – Western District of Wisconsin
February 2014 (Deposition Testimony)

Split Pivot, Inc. v. Trek Bicycle Corporation
United States District Court – Western District of Wisconsin
December 2013 (Deposition Testimony)

In Re Innovatio IP Ventures, LLC, Patent Litigation
United States District Court - Northern District of Illinois
September 2013 (Trial Testimony)
September 2013 (Deposition Testimony)

Sloan Valve Company v. Zurn Industries, Inc. and Zurn Industries, LLC
United States District Court - Northern District of Illinois
March 2013 (Deposition Testimony)

Nordock, Inc. v. Systems, Inc.
United States District Court - Eastern District of Wisconsin
March 2013 (Trial Testimony)
January 2013 (Deposition Testimony)
August 2012 (Deposition Testimony)

ABT Systems, LLC, et al. v. Emerson Electric Co.
United States District Court - Eastern District of Missouri
February 2013 (Trial Testimony)
July 2012 (Deposition Testimony)

Illumination Management Solutions, Inc. v. Ruud Lighting, Inc.
United State District Court - Eastern District of Wisconsin
October 2012 (Deposition Testimony)

Rockwell Automation, Inc. et al. v. WAGO Corporation, et al.
United State District Court - Western District of Wisconsin
October 2012 (Trial Testimony)
August 2012 (Deposition Testimony)

Raymond Caluori v. One World Technologies, Inc.
United States District Court - Central District of California
June 2012 (Trial Testimony)
January 2012 (Deposition Testimony)

Michael Foods, Inc. v. National Pasteurized Eggs, Inc.
United States District Court - Western District of Wisconsin
June 2012 (Trial Testimony)
April 2012 (Deposition Testimony)

Thermal Design, Inc. v. American Society of Heating, Refrigerating, and Air Conditioning Engineers, Inc.
United States District Court - Eastern District of Wisconsin
May 2012 (Deposition Testimony)

Wausau Homes Incorporated v. Everest Builders of Minocqua, Inc.
United States District Court - Western District of Wisconsin
April 2012 (Deposition Testimony)

Quad/Graphics, Inc. v. One2One Communications, LLC, et al.
United States District Court - Eastern District of Wisconsin
December 2011 (Trial Testimony)

Thermal Design, Inc. v. Guardian Building Products, Inc., et al.
United States District Court - Eastern District of Wisconsin
December 2011 (Deposition Testimony)

PUBLICATIONS:

The Comprehensive Guide to Lost Profits and Other Commercial Damages, “Patent Infringement Damages: Lost Profits and Royalties” (Chapter 25, 2014 3rd ed., BVR Publications)

April 2011 – CCH Business Valuation Alert, “The *Uniloc* Case: 25 Percent Rule of Thumb Rejected”

The Comprehensive Guide to Lost Profits, “Lost Profits Damages in Patent Infringement Lawsuits” (Chapter 19, 2011 ed., BVR Publications)

August 2009 – IP Law360 – “Demand for the Patented Product – Lower Bar?”

The Comprehensive Guide to Lost Profits, “Lost Profits Damages in Patent Infringement Lawsuits” (Chapter 12, 2009 ed., BVR Publications)

October 2008 – AIPLA White Paper – “Constructing Royalty Rates”

February 2008 – IP Law360 – “IP Litigation in China and the U.S.”

Global Intellectual Property Asset Management Report, “Intellectual Property Metrics Today: It Can Be Done” (June 2005 and July 2005)

Proving and Pricing Construction Claims, “Claims for Lost Profit” (Chapter 14, 2nd ed., 1996, Wiley Law Publications)

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Government	Percentage
Current government	85%
Previous government	15%

10/10/2014

11/11/2016

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A horizontal bar chart titled 'U.S. should take action to address climate change' showing the percentage of respondents who believe the U.S. should take action to address climate change, broken down by age group. The y-axis lists age groups: 18-29, 30-49, 50-64, 65+, and All. The x-axis represents the percentage from 0 to 100. The bars show that 75% of 18-29, 90% of 30-49, 80% of 50-64, 65% of 65+, and 78% of All respondents believe the U.S. should take action to address climate change.

Age Group	Percentage
18-29	75%
30-49	90%
50-64	80%
65+	65%
All	78%

Government	Percentage
Current government	100%
Previous government	0%

[illegible]

Service	Percentage
Online banking	95%
Mobile banking	88%
Bill payment	82%
Direct deposit	78%
ATM withdrawals	72%
Branch visits	65%
Paper statements	58%

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Age Group	Should Take Action (%)	Should Not Take Action (%)
18-29	80	20
30-49	80	20
50-69	80	20
70+	80	20

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Age Group	Strongly Oppose	Oppose	Support	Strongly Support
18-24	10%	20%	30%	40%
25-34	15%	25%	35%	25%
35-44	20%	30%	30%	20%
45-54	25%	35%	25%	15%
55-64	30%	40%	20%	10%
65+	35%	45%	15%	5%

10/10/2016

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1. **Introduction**
 2. **Background**
 3. **Methodology**
 4. **Results**
 5. **Discussion**
 6. **Conclusion**
 7. **References**
 8. **Appendix**
 9. **Figure 1**
 10. **Figure 2**
 11. **Figure 3**
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 217. **Figure 209**

1. The first part of the document discusses the importance of maintaining accurate records of all transactions and the role of the accounting system in providing reliable financial information. It emphasizes the need for transparency and accountability in financial reporting.

2. The second part of the document focuses on the internal control system, which is designed to prevent and detect errors and fraud. It outlines the key components of an effective internal control system, including segregation of duties, authorization, and documentation.

3. The third part of the document addresses the external audit process, which is conducted by independent auditors to provide an opinion on the fairness and accuracy of the financial statements. It discusses the role of the auditor and the importance of a strong audit trail.

4. The fourth part of the document discusses the impact of accounting on business decision-making. It highlights how financial data is used by management to evaluate performance, identify trends, and make strategic decisions.

5. The fifth part of the document discusses the role of accounting in the broader business environment. It explores how accounting information is used by various stakeholders, including investors, creditors, and government agencies, to make informed decisions.

6. The sixth part of the document discusses the challenges facing the accounting profession and the need for continuous improvement. It highlights the importance of staying up-to-date with the latest accounting standards and technologies.

7. The seventh part of the document discusses the role of accounting in the future of business. It explores how emerging technologies, such as artificial intelligence and blockchain, are transforming the accounting profession and the business landscape.

8. The eighth part of the document discusses the role of accounting in the global economy. It explores how accounting information is used by multinational corporations and international organizations to manage their financial affairs.

9. The ninth part of the document discusses the role of accounting in the public sector. It explores how accounting information is used by government agencies to manage public resources and ensure transparency in government operations.

10. The tenth part of the document discusses the role of accounting in the non-profit sector. It explores how accounting information is used by non-profit organizations to manage their financial affairs and ensure transparency in their operations.

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The diagram consists of two identical vertical sections, each containing a series of horizontal bars. Each section is bounded by a blue header bar at the top and a grey footer bar at the bottom. Between these bars, there are several rows of horizontal bars of varying lengths and positions. Black rectangular markers are placed at various points along these bars, some appearing as small squares and others as larger rectangles. The markers are distributed across the entire width of the diagram, with some appearing in the blue header area and others in the grey footer area. The overall layout is symmetrical and repetitive, suggesting a template or a standardized format for data representation.

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The image displays 15 horizontal bars, each representing a different sequence or pattern. The patterns are as follows:

- Bar 1: A solid black bar.
- Bar 2: A solid black bar.
- Bar 3: A solid black bar.
- Bar 4: A solid black bar.
- Bar 5: A solid black bar.
- Bar 6: A solid black bar.
- Bar 7: A solid black bar.
- Bar 8: A solid black bar.
- Bar 9: A solid black bar.
- Bar 10: A solid black bar.
- Bar 11: A solid black bar.
- Bar 12: A solid black bar.
- Bar 13: A solid black bar.
- Bar 14: A solid black bar.
- Bar 15: A solid black bar.

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Figure 1: Schematic representation of the experimental design. The figure is divided into two main parts: 'Training' and 'Test'. The 'Training' part shows a sequence of 12 trials. Trials 1-4 are 'Control' trials with a single stimulus (a black bar). Trials 5-8 are 'Adaptation' trials with a single stimulus (a black bar). Trials 9-12 are 'Test' trials with a single stimulus (a black bar). The 'Test' part shows a sequence of 12 trials. Trials 1-4 are 'Control' trials with a single stimulus (a black bar). Trials 5-8 are 'Adaptation' trials with a single stimulus (a black bar). Trials 9-12 are 'Test' trials with a single stimulus (a black bar).

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The diagram illustrates the five types of simple machines, each with a corresponding icon and label:

- Lever:** A horizontal bar resting on a triangular fulcrum.
- Inclined Plane:** A straight ramp sloping upwards.
- Wedge:** Two inclined planes joined at their bases, forming a triangular shape.
- Pulley:** A wheel with a rope or cable passing over it.
- Screw:** A cylindrical object with a helical thread wrapped around it.

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Category	Item	Value	Unit	Notes
Category A	Item A1	10	kg	
	Item A2	25	kg	
	Item A3	15	kg	
	Item A4	5	kg	
	Item A5	20	kg	
	Item A6	30	kg	
	Item A7	28	kg	
	Item A8	18	kg	
	Item A9	22	kg	
	Item A10	12	kg	
Category B	Item B1	15	kg	
	Item B2	20	kg	
	Item B3	10	kg	
	Item B4	25	kg	
	Item B5	18	kg	
	Item B6	22	kg	
	Item B7	12	kg	
	Item B8	28	kg	
	Item B9	15	kg	
	Item B10	20	kg	
Category C	Item C1	10	kg	
	Item C2	25	kg	
	Item C3	15	kg	
	Item C4	5	kg	
	Item C5	20	kg	
	Item C6	30	kg	
	Item C7	28	kg	
	Item C8	18	kg	
	Item C9	22	kg	
	Item C10	12	kg	
Category D	Item D1	15	kg	
	Item D2	20	kg	
	Item D3	10	kg	
	Item D4	25	kg	
	Item D5	18	kg	
	Item D6	22	kg	
	Item D7	12	kg	
	Item D8	28	kg	
	Item D9	15	kg	
	Item D10	20	kg	
Category E	Item E1	10	kg	
	Item E2	25	kg	
	Item E3	15	kg	
	Item E4	5	kg	
	Item E5	20	kg	
	Item E6	30	kg	
	Item E7	28	kg	
	Item E8	18	kg	
	Item E9	22	kg	
	Item E10	12	kg	

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Category	Item	Value	Unit	Notes
Category 1	Item 1.1	100	kg	Weight
	Item 1.2	200	kg	Weight
	Item 1.3	150	kg	Weight
	Item 1.4	180	kg	Weight
	Item 1.5	120	kg	Weight
	Item 1.6	160	kg	Weight
	Item 1.7	140	kg	Weight
	Item 1.8	170	kg	Weight
	Item 1.9	130	kg	Weight
	Item 1.10	190	kg	Weight
Category 2	Item 2.1	50	kg	Weight
	Item 2.2	75	kg	Weight
	Item 2.3	60	kg	Weight
	Item 2.4	80	kg	Weight
	Item 2.5	45	kg	Weight
	Item 2.6	90	kg	Weight
	Item 2.7	55	kg	Weight
	Item 2.8	70	kg	Weight
	Item 2.9	65	kg	Weight
	Item 2.10	85	kg	Weight
Category 3	Item 3.1	30	kg	Weight
	Item 3.2	40	kg	Weight
	Item 3.3	25	kg	Weight
	Item 3.4	35	kg	Weight
	Item 3.5	20	kg	Weight
	Item 3.6	45	kg	Weight
	Item 3.7	30	kg	Weight
	Item 3.8	40	kg	Weight
	Item 3.9	25	kg	Weight
	Item 3.10	35	kg	Weight
Category 4	Item 4.1	10	kg	Weight
	Item 4.2	15	kg	Weight
	Item 4.3	5	kg	Weight
	Item 4.4	20	kg	Weight
	Item 4.5	10	kg	Weight
	Item 4.6	15	kg	Weight
	Item 4.7	5	kg	Weight
	Item 4.8	20	kg	Weight
	Item 4.9	10	kg	Weight
	Item 4.10	15	kg	Weight

Government	Percentage
Current government	75%
Previous government	25%

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Category	Item	Value	Unit	Notes
Category A	Item A1	100	kg	
	Item A2	150	kg	
	Item A3	120	kg	
	Item A4	80	kg	
	Item A5	110	kg	
	Item A6	130	kg	
	Item A7	90	kg	
	Item A8	140	kg	
	Item A9	160	kg	
	Item A10	170	kg	
Category B	Item B1	200	kg	
	Item B2	180	kg	
	Item B3	220	kg	
	Item B4	190	kg	
	Item B5	210	kg	
	Item B6	230	kg	
	Item B7	240	kg	
	Item B8	250	kg	
	Item B9	260	kg	
	Item B10	270	kg	
Category C	Item C1	300	kg	
	Item C2	280	kg	
	Item C3	320	kg	
	Item C4	290	kg	
	Item C5	310	kg	
	Item C6	330	kg	
	Item C7	340	kg	
	Item C8	350	kg	
	Item C9	360	kg	
	Item C10	370	kg	
Category D	Item D1	400	kg	
	Item D2	380	kg	
	Item D3	420	kg	
	Item D4	390	kg	
	Item D5	410	kg	
	Item D6	430	kg	
	Item D7	440	kg	
	Item D8	450	kg	
	Item D9	460	kg	
	Item D10	470	kg	

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Category	Value
Category 1	10
Category 2	5
Category 3	20
Category 4	15
Category 5	8

Administration	Percentage
Current Administration	80%
Previous Administration	20%

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Category	Should take action	Should not take action
Overall	85%	15%
Male	83%	17%
Female	87%	13%
18-29	88%	12%
30-49	85%	15%
50-69	82%	18%
70+	78%	22%

Category	Item	Value	Unit
Category 1	Item 1.1	10	kg
	Item 1.2	20	kg
	Item 1.3	30	kg
	Item 1.4	40	kg
Category 2	Item 2.1	50	kg
	Item 2.2	60	kg
	Item 2.3	70	kg
	Item 2.4	80	kg
Category 3	Item 3.1	90	kg
	Item 3.2	100	kg
	Item 3.3	110	kg
	Item 3.4	120	kg
Category 4	Item 4.1	130	kg
	Item 4.2	140	kg
	Item 4.3	150	kg
	Item 4.4	160	kg

Age Group	Number of People
0-14	10
15-24	20
25-34	30
35-44	25
45-54	20
55-64	15
65-74	10
75-84	5
85+	2

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Response	Percentage
U.S. should take action	85%
U.S. should not take action	15%

The diagram shows a gel electrophoresis setup with four lanes. Each lane contains a series of horizontal black bars representing DNA bands. Lane 1 has three bands: one near the top, one in the middle, and one near the bottom. Lane 2 has four bands: one near the top, two in the middle, and one near the bottom. Lane 3 has three bands: one near the top, one in the middle, and one near the bottom. Lane 4 has four bands: one near the top, two in the middle, and one near the bottom. A horizontal line runs across the middle of the gel, separating the top and bottom halves.

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Response	Percentage
U.S. should take action	15%
U.S. should take action	20%
U.S. should take action	25%
U.S. should take action	30%
U.S. should take action	35%
U.S. should take action	40%
U.S. should take action	45%
U.S. should take action	50%
U.S. should take action	55%
U.S. should take action	60%
U.S. should take action	65%
U.S. should take action	70%
U.S. should take action	75%
U.S. should take action	80%
U.S. should take action	85%
U.S. should not take action	15%
U.S. should not take action	20%
U.S. should not take action	25%
U.S. should not take action	30%
U.S. should not take action	35%
U.S. should not take action	40%
U.S. should not take action	45%
U.S. should not take action	50%
U.S. should not take action	55%
U.S. should not take action	60%
U.S. should not take action	65%
U.S. should not take action	70%
U.S. should not take action	75%
U.S. should not take action	80%
U.S. should not take action	85%

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Age Group	Percentage
18-24	~85%
25-34	~75%
35-44	~65%
45-54	~55%
55-64	~35%
65+	~95%
75+	~85%
85+	~45%
95+	~55%

The figure consists of four bar charts, each representing a different country: Canada, France, Germany, and the United States. Each chart shows the percentage of families with a specific number of children (0 to 6). The horizontal axis for all charts is labeled 'Number of children' and ranges from 0 to 6. The vertical axis is labeled 'Percentage of families' and ranges from 0% to 100%.

- Canada:** The distribution is skewed to the right, with a peak at 1 child (approximately 35%). The percentage decreases as the number of children increases, with about 5% of families having 6 children.
- France:** The distribution is more spread out, with a peak at 2 children (approximately 25%). There is a notable increase in the percentage of families with 5 children (approximately 10%) compared to 4 children (approximately 5%).
- Germany:** The distribution is skewed to the left, with a peak at 0 children (approximately 45%). The percentage decreases as the number of children increases, with about 5% of families having 6 children.
- United States:** The distribution is skewed to the right, with a peak at 1 child (approximately 35%). The percentage decreases as the number of children increases, with about 5% of families having 6 children.

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(b) (5) DPP, (b) (7)(C), (b) (7)(D)

(b) (5) DPP, (b) (7)(C), (b) (7)(D)

(b) (5) DPP, (b) (7)(C), (b) (7)(D)

Category	Sub-category	Value
Category 1	Sub-category 1.1	100
	Sub-category 1.2	120
	Sub-category 1.3	150
	Sub-category 1.4	130
	Sub-category 1.5	110
	Sub-category 1.6	140
	Sub-category 1.7	90
Category 2	Sub-category 2.1	110

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Gender	Should take action	Should not take action
Men	85%	15%
Women	85%	15%

Age Group	Number of People
13-17	95
18-24	85
25-34	75
35-44	65
45-54	55
55-64	45
65-74	35
75-84	25
85-94	15
95+	5

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